

From: Rochlin, Kevin
Sent: Thursday, December 12, 2013 11:51 AM
To: Barbara Ritchie
Cc: Rochlin, Kevin; Douglas.Tanner; Greutert, Ed [USA]; Kelly Wright; Scott Miller; Stifelman, Marc; Susan H; Zavala, Bernie
Subject: EPA's response to FMC's response to the RD Work Plan comments
Attachments: EPA responses to FMC comment responses on the RD Work Plan.docx

See attached.

Kevin Rochlin



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

December 12, 2013

Reply to
Attn. of ECL-111

Ms. Barbara Ritchie
FMC Corporation
1735 Market Street
Philadelphia, Pennsylvania 19103

**RE: Unilateral Administrative Order for Remedial Design and Remedial Action
EPA Docket No. CERCLA 10-2013-0116**

**EPA review of FMC responses to comments on the Remedial Design Work Plan for the
Fmc OU Dated August 2013**

Dear Ms. Ritchie:

EPA has reviewed the FMC responses to comments on the referenced document. There are still a few issues that have not been adequately addressed as presented below:

EPA Comments

Comment 8: Section 4.1.5, Page 4-7. Excavation. There will need to be a performance standard measuring gamma.

EPA may require a direct measure of gamma in this area. If it is required, it will be part of the PSVP.

Resolution: No change to the document is required.

Shoshone-Bannock Tribes Comments

The Tribes maintain the positions that are stated in the comments.

Resolution: No changes to the document are required.

4. Section 2.1.5 – Page 2-3 1st full paragraph. Add and migrates into the Off-Plant OU as surface water and into springs which discharge onto the Fort Hall Reservation.

The response notes that notes that the point at which groundwater migrates into the Off-Plant OU as surface water is not located within the Fort Hall Indian Reservation. The impacted groundwater is flowing through the Reservation land until reaching the Reservation boundary, continues to flow off of Reservation land until reaching the Portneuf River, discharging at a point that is not on Reservation land. However, approximately 1.3 miles north of the discharge springs, the Portneuf River then flows back onto Reservation land.

Resolution: This flow path should be identified in the hydrology background discussion.

IDEQ Comments

1. FMC's response to DEQ specific comment #6 is still technically incorrect, as it was in all other site documents in which similar statements have appeared.

Resolution: Text still not accurate and needs to be corrected.

2. FMC's response to DEQ specific comment #10, #11 and Extraction Zone Hydrogeologic Study Work Plan general comment 1 is correct in that a permit for well construction is not required under CERCLA; however, FMC is required to construct monitoring and extraction wells in compliance to Idaho code.

Resolution: The text needs to state that all monitoring and extraction wells will comply with Idaho well construction standards.

Please let me know if you would like to hold a conference call to discuss these.

Sincerely,



Kevin Rochlin,
Project Manager

**EPA review of FMC responses to comments on the Extraction Zone Hydrogeologic Study
Work Plan submitted July 15, 2013**